

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Case No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Case No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP BRANCHES,
et al.,

Plaintiffs,

v.

JOHN STEEN, *et al.*,

Defendants.

Case No. 2:13-cv-291 (NGR)

**JOINT RESPONSE OF PLAINTIFFS TEXAS STATE CONFERENCE OF NAACP
BRANCHES AND MEXICAN AMERICAN LEGISLATIVE CAUCUS AND
PLAINTIFF-INTERVENORS TEXAS LEAGUE OF YOUNG VOTERS
EDUCATION FUND AND IMANI CLARK TO UNITED STATES'
MOTION FOR A STAY IN LIGHT OF LAPSE OF APPROPRIATIONS**

Plaintiffs Texas State Conference of NAACP Branches and Mexican American Legislative
Caucus of the Texas House of Representatives and Plaintiff-Intervenors Texas League of Young
Voters Education Fund and Imani Clark do not oppose the motion by the United States for a stay in

light of the suspension of appropriations. However, because these are consolidated cases involving parties other than the United States, these Plaintiffs and Plaintiff-Intervenors respectfully request that the Court clarify the effect of a grant of the Motion for a Stay, and direct that the relief requested by the United States should apply to all existing deadlines for all parties in the consolidated cases, with the exception of the deadline for Texas to respond to the complaints by October 25, 2013. The duration of the suspension of appropriations is uncertain. If the suspension is relatively short-lived, then it would make sense for the stay to affect all parties and all three cases similarly, so as not to subject the parties to duplicative discovery and confusing schedules. If the suspension is very long, it may have more serious ramifications, but, in any event, the Court and the parties would be free to revisit the issue at any time. These Plaintiffs and Plaintiff-Intervenors, therefore, respectfully request that the stay requested by the United States be applied to all deadlines in the consolidated cases, with the exception of the deadline for Texas to respond to the complaints by October 25, 2013.

Dated: October 3, 2013

/s/ Amy L. Rudd

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*This complaint has been prepared by an institute affiliated with New York University School of Law, but does not purport to present the school's institutional views, if any.

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CERTIFICATE OF SERVICE

I hereby certify that on October 3, 2013, I served a true and correct copy of the foregoing via the Court's ECF system on all counsel of record.

I also certify that upon filing, I will immediately serve a true and correct copy of the foregoing via e-mail on the following counsel who have not yet appeared:

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